

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric)
Company d/b/a/ Ameren Missouri's)
Filing to Implement Regulatory)
Changes in Furtherance of Energy) Case No. EO-2012-0142
Efficiency as allowed by MEEIA)

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
APPLICATION TO INTERVENE**

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting MDNR's Application to Intervene. For its Application, MDNR states as follows:

1. On January 20, 2012, Ameren Missouri (Ameren) filed an application to approve DSIM filing, request for variances and motion to adopt procedural schedule with the Missouri Public Service Commission (PSC). The PSC opened Case No. EO-2012-0142 to consider Ameren's application and on January 23, 2012, issued an order directing notice, establishing a deadline for requests to intervene and scheduling a procedural conference. The Order sets a January 27, 2012 deadline for interested parties to intervene, and a February 2, 2012 pre-hearing conference.

2. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Division of Energy will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. The Division of Energy's review also will be in relation to the requirements set forth in rules 4 CSR 240-3.163-4, which lists the information that an electric utility must provide when it seeks to establish a Demand-Side Programs Investment Mechanism (DSIM) and to seek approval, modification or discontinuance of demand-side programs. MDNR has a strong interest in encouraging energy efficiency through cost-effective demand-side programs and this interest can be significantly furthered through DSIM filings made under these rules.

4. MDNR has not determined the specific position it will take in this case; however, the Division of Energy has an interest in participating in this matter.

5. Communications, correspondence, orders and decision in this matter should be addressed to:

Jennifer S. Frazier
Deputy Chief Counsel
Agriculture & Environment Division
P.O. Box 899
Jefferson City, Missouri 65102
573-751-8795
573-751-8796 (fax)

Email: Jenny.Frazier@ago.mo.gov

with a copy to:

Mary Ann Young
Legal Counsel, Division of Energy
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City MO 65102
573-526-7052
573-526-7553 (fax)
Email: DNREnergyCases@dnr.mo.gov

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission grant this Application to Intervene

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/ Jennifer S. Frazier
JENNIFER S. FRAZIER, Bar No. 39127
Deputy Chief Counsel
Agriculture & Environment Division
P.O. Box 899
Jefferson City, MO 65102
573-751-8795
573-751-8796 (fax)
Jenny.Frazier@ago.mo.gov
**Attorney for Missouri Department of
Natural Resources**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 27th day of January 2012.

/s/ Jennifer S. Frazier _____
JENNIFER S. FRAZIER
Deputy Chief Counsel
Agriculture & Environment Division